

Date: 19 March 2004

Comments re Dockets 03-104 and 04-37 (BPL NPRM)

Honorable Commissioners:

Although the present Access BPL Notice of Proposed Rulemaking does take steps towards mitigating harmful interference to licensed amateur radio stations operating from fixed locations, it neglects to address such interference when those stations are temporarily relocated as portable or mobile stations, especially in rural locations where BPL is likely to enjoy its highest demand.

Both ARES and RACES members are prepared to set up either mobile or portable HF or low VHF stations at rural disaster sites to provide responding agencies with what is often the sole means of emergency communications. Examples of the value of this kind of service are too numerous to cite here, but they should be well known to many Commission officers.

Emergency HF and VHF stations must be sited according to the requirements of the served agencies, with little regard for available amenities to ensure strong receive and transmit signals. Thus interference from BPL emissions may impair or totally disable these stations emergency communications capabilities. Further, they must be made operational on very short notice; it is unlikely that BPL interference problems could be mitigated through FCC regulatory action in time to meet emergency communications requirements.

BPL-induced impairment to such emergency communications could seriously impact the lives, health and property of disaster victims and first responders. The Commissioners are therefore urged to amend the NPRM to require technical proof of non-interference over the entire BPL distribution system on an ongoing basis.

Sincerely,
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